

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<hr style="border: 0.5px solid black;"/> In re:)	
)	
THE FINANCIAL OVERSIGHT AND)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,)	Title III
)	
as representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,)	No. 17 BK 3283-LTS
)	(Jointly Administered)
Debtors. ¹)	
<hr style="border: 0.5px solid black;"/>)	
In re:)	
)	PROMESA
THE FINANCIAL OVERSIGHT AND)	Title III
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	
as representative of)	
)	
THE COMMONWEALTH OF PUERTO RICO,)	No. 17 BK 3283-LTS
)	
PUERTO RICO HIGHWAYS &)	No. 17 BK 3567-LTS
TRANSPORTATION AUTHORITY,)	(This Filing Relates to
)	These Debtors)
Debtor.)	
<hr style="border: 0.5px solid black;"/>)	
PEAJE INVESTMENTS LLC,)	
)	Adv. Proc. No. 17-151-LTS
Plaintiff,)	in 17 BK 3567-LTS
)	
v.)	Adv. Proc. No. 17-152-LTS
)	in 17 BK 3283-LTS
PUERTO RICO HIGHWAYS &)	

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

TRANSPORTATION AUTHORITY, *et al.*,)
)
Defendants.²)

JOINT STATUS REPORT

Plaintiff Peaje Investments LLC (“Plaintiff”), together with Defendants the Financial Oversight and Management Board for Puerto Rico (the “FOMB”), as representative of defendants the Commonwealth of Puerto Rico (“Commonwealth”) and Puerto Rico Highways and Transportation Authority (“HTA”), Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), Wanda Vázquez Garced, Raúl Maldonado Gautier, José Iván Marrero Rosado, Omar J. Marrero, and Carlos Contreras Aponte (collectively, the “Parties”), respectfully submit this Joint Status Report in response to the Court’s July 21, 2020 Order (*available at*: Adv. Proc. No. 17-151-LTS, [Dkt. No. 304]) directing the Parties to “submit a brief joint status report further updating the Court on or before **November 20, 2020.**”

To avoid unnecessarily burdening the Court by repeating several pages of information contained in the previous joint status reports filed with the Court since November 14, 2018, the Parties refer to their comprehensive July 20, 2020 Joint Status Report (*available at*: Adv. Proc. No. 17-151-LTS, [Dkt. No. 303]), and by this reference, incorporate the same herein as though fully set forth. This Joint Status Report addresses relevant events occurring after July 20, 2020.

² Pursuant to F. R. Bankr. P. 7025 and F. R. Civ. P. 25(d), the following automatic substitutions are made for defendants who were sued in their former official capacities: (i) the Hon. Wanda Vázquez Garced, in her official capacity as Governor of Puerto Rico, is automatically substituted for Ricardo Antonio Rosselló Nevares; (ii) the Hon. Francisco Parés, in his official capacity as Secretary of Treasury of Puerto Rico, is automatically substituted for the Hon. Raúl Maldonado Gautier; and (iii) Omar J. Marrero, in his official capacity as executive director of AAFAF, is automatically substituted for Christian Sobrino Vega.

On September 9, 2020, the Title III Court issued its *Memorandum Opinion and Order Denying HTA and PRIFA Revenue Bond Stay Relief Motions* (available at: Case No. 17-03567-LTS, [Dkt. No. 921]) denying the *Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company for Relief from Automatic Stay, or, in the Alternative, Adequate Protection* relating to the Commonwealth and HTA Lift Stay Motion (available at: Case No. 17-03567-LTS, [Dkt. No. 673]) (the “HTA Lift Stay Motion”). On September 23, 2020, the HTA Lift Stay Motion movants filed a notice of appeal (available at: Case No. 17-03567-LTS, [Dkt. No. 927]). The First Circuit has issued an expedited briefing schedule in the appeal (Case No. 20-1930), and indicated that argument is contemplated to be heard in February 2021.

The motion for partial summary judgment in the Commonwealth Revenue Bond Adversary Proceeding (Adv. Proc. No. 20-00005-LTS) was fully briefed, argued to the Court on September 23, 2020, and taken under submission by the Court on that date.

The Parties believe the adversary proceedings that are the subject of this status report involve similar or overlapping issues with the Commonwealth Revenue Bond Adversary Proceeding, described above, and the HTA Revenue Bond Adversary Proceeding (Adv. Proc. No. 20-00007-LTS). For the sake of efficiency and judicial economy, the Parties have agreed to continue to refrain from litigating these adversary proceedings at this time. The Parties respectfully request the entry of an order directing them to report to the Court on or before February 19, 2021 to inform the Court of the status of these matters and their respective positions in light of the foregoing. The Parties have agreed that, in the interim, they will not be foreclosed from taking appropriate legal action in or outside the above-captioned adversary proceedings.

Respectfully submitted this 20th day of November 2020.

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